

September 25, 2024

Hon. Analisa Torres, U.S. District Judge
U.S. District Court for the Southern District of New
York 500 Pearl Street, Room 750
New York, New York 10007
(via ECF)

Re: **Response to Defendants' motion to seal**

Your Honor,

I am the pro-se Plaintiff in the above referenced matter, hereinafter referred to in the first person or as "Plaintiff." Plaintiff must respond to Defendants' September 20, 2024 Motion to Seal (ECF #435). It reads:

*Defendants are currently seeking to redact two categories of documents. First, Defendants have redacted the personal **e-mail addresses, cell phone numbers and compensation information** appearing in the exhibits supporting Defendants' Motion, **many of which belong to third parties....***

*Second, Defendants have also **redacted the payment terms** from a draft settlement agreement contemplated between Plaintiff and Defendants. Ex. 44, 45, 46.*

(emphasis added)

Plaintiff has no objection to the first category (personal email addresses; cell phone numbers; and compensation information, 'many of which of pertain to third parties') being treated as confidential.

Plaintiff does, however, object to the sealing of "payments terms" found in the communications regarding the settlement agreement (Exhibits 44, 45, and 46).

The first exhibit (Exhibit 44) contains a redaction of the amount of the settlement (\$1.2 million). It is unclear why this would be confidential and, moreover, this is information already in the public domain (reported on in the press over four years ago *and* found in the Amended Complaint and other public filings in this case).¹

The second two exhibits redact a paragraph that contains a payment schedule.

- There is no reason for a payment schedule to be confidential;
- Defendants' letter never explains why such information is confidential;
- None of the 'payment terms' include banking information or otherwise sensitive information; and

¹ <https://nypost.com/2020/03/13/ex-trump-advisor-allegedly-fired-over-pregnancy-never-got-1-2m-settlement-suit-claims/>

- It is germane to the facts that court will consider. As Defendants' own cited caselaw notes, there is a presumption of public access to judicial documents.

No countervailing factors here warrant confidentiality or sustain the redactions made in Exhibits 44, 45, and 46.

Plaintiff thanks the Court for its time.

Respectfully and humbly submitted,

s/Arlene Delgado
Arlene Delgado